

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

LAUREN BALLARD,

Plaintiff,

v.

WESTON & SAMPSON ENGINEERS, INC, ET
AL.,

Defendants.

C/A No. 2:24-cv-01682-RMG-BM

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER PURSUANT TO RULE
502(d)**

Plaintiff, Lauren Ballard (“Plaintiff”), and Defendants Weston & Sampson Engineers, Inc., and Jason Roberts (“Defendants”), by and through their respective undersigned counsel, hereby request entry of the attached proposed Rule 502(d) Protective Order pursuant to Federal Rule of Evidence 502, stating as follows:

The production of privileged or work-product protected documents, electronically stored information (“ESI”) or other information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

[SIGNATURE PAGE ATTACHED]

Respectfully submitted,

s/ Jennifer Munter Stark

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JASON ROBERTS

Dated this the 13th day of September, 2024.